

EXHIBIT B

From: Shawn Shearer <shawn@shearerlaw.pro>
Sent: Wednesday, May 16, 2018 12:28 PM
To: Eidelman, Gary B.
Cc: Cooper, Gillian A.; Kennedy, Lindsey C.
Subject: RE: Barger v. First Data - Scheduling Deposition of E.J. Jackson

Gary – I am in the process of revising Mr. Barger’s responses to his interrogatories. Plaintiff’s revision will provide that answer within a few hours, and I will be adding related documents to production later today or tonight. In the mean time, you can ask Defendant Charron what relevance he believes Mr. Jackson may have.

Let me know as soon as possible as to whether that date works.

Shawn E. Shearer
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From: [Eidelman, Gary B.](#)
Sent: Wednesday, May 16, 2018 11:22 AM
To: [Shawn Shearer](#)
Cc: [Cooper, Gillian A.](#); [Kennedy, Lindsey C.](#)
Subject: Re: Barger v. First Data - Scheduling Deposition of E.J. Jackson

Shawn:

For what purpose do you seek to depose Mr. Jackson?

What is the relevance of his testimony to this case?

Gary B. Eidelman
Sent from my iPhone

On May 16, 2018, at 11:52 AM, Shawn Shearer <shawn@shearerlaw.pro<<mailto:shawn@shearerlaw.pro>>> wrote:

Gary, Gillian & Lindsey - I am going to be in the Bay Area on other business the first week of July and while I am there, I would like to depose E.J. Jackson, currently First Data’s SVP & GM of Security and Fraud Solutions, the morning of July 2nd – probably just half a day. Please let me know if he is available.

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"Saul Ewing Arnstein & Lehr LLP (saul.com) " made the following annotations:

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